



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

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June 11, 1998

RE: DOE FEMP
COMMENTS: A1P2 SITE PREPARATION
PACKAGE

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. Reising:

Ohio EPA has reviewed DOE's May 13, 1998 submittal, "Submittal of Site Preparation Work Plan Package for the Area 1 Phase II". Attached are our comments regarding the document.

If you have any questions, please contact Donna Bohannon or me.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Ruth Vandergrift, ODH
Mark Shupe, HSI GeoTrans
Francie Barker, Tetra Tech EM Inc.
Manager, TPSS/DERR, CO

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Comment: Sediment Basin 1. It appears as though a mark has been added to outlet structure to indicate maximum level of sediment. Drawing should indicate color and purpose of mark.

29. Commenting Organization: OEPA Commentor: DSW
Section #: Pg. #: Line #: Code: C
Original Comment #:

Comment: The documents refer to installation of silt fence as indicated on the drawings and the only silt fence on the drawings is along a conveyance channel not along a contour. This is not a correct installation of silt fence and no other silt fence installation is indicated. Please clarify.

AREA 1, PHASE II SITE PREPARATION WORK PLAN PACKAGE

Site Preparation Work Plan

1. Commenting Organization: OEPA Commentor: OFFO
 Section #: General Comment Pg. #: Line #: Code: C
 Original Comment #:
 Comment: The site preparation package should be revised to incorporate changes based upon the revised A1P2 Certification Report. For example, include removal of lead hot spot and disposition of portions of the conveyance ditch to the OSDF.

2. Organization: OEPA Commentor: OFFO
 Section #: 3.1 Pg. #: 4 Line #: Code: C
 Original Comment #:
 Comment: Ohio EPA disagrees with the proposed preliminary activities. As stated on the drawings, "Sediment trap shall be constructed and operational before upslope land disturbance begins." Ohio EPA does not believe adequate storm water controls will be in place to allow initiation of borrow activities prior to completion of the sediment trap. Work sequencing should be revised to ensure adequate storm water controls are in place prior to initiation of any other construction activities.

3. Commenting Organization: OEPA Commentor: DSW
 Section #: 3.2.3 Pg. #: 6 Line #: 3-7 Code: C
 Original Comment #:
 Comment: The order of construction of the surface water management components should be from downstream to upstream so that the sediment trap and sediment basin are the constructed first, prior to any additional clearing and grubbing.

4. Commenting Organization: OEPA Commentor: OFFO
 Section #: 3.2.4.2 Pg. #: 7 Line #: 22-24 Code: C
 Original Comment #:
 Comment: It appears that MTL A12-009 may be located on top of above WAC Tc-99 concentrations. Ohio EPA recommends not using this location until such time as WAC delineation at the STP is completed.

5. Commenting Organization: OEPA Commentor: OFFO
 Section #: 3.5 Pg. #: 9 Line #: Code: C
 Original Comment #:
 Comment: The document should include a discussion of the basis for assuming interim seeding is appropriate in the channel and disturbed areas. Is it expected the channel and basin will be removed within two years?

Design Criteria Package

6. Commenting Organization: OEPA Commentor: OFFO
 Section #: General Comment Pg. #: Line #: Code: C
 Original Comment #:
 Comment: It appears that this document was not revised to reference only the site preparation

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activities. The other documents in the package only reference site prep activities while this one continues to refer to above WAC material excavation and other activities that are expected to occur in latter phases.

7. Commenting Organization: OEPA Commentor: OFFO
Section #: 1.3.1 Pg. #: 1-6 Line #: paragraph 4 Code: C
Original Comment #:

Comment: This sentence is not clear on whether materials above WAC will be transferred to SP-5 stockpile or a stockpile near SP-5. Please clarify.

8. Commenting Organization: OEPA Commentor: DSW
Section #: 1.3.4 Pg. #: 1-7 Line #: Code: C
Original Comment #:

Comment: The site wide problems with treatment of storm water should be addressed. The site already is unable to adequately treat the storm water from the various source and this proposes an additional source to the BSL.

9. Commenting Organization: OEPA Commentor: OFFO
Section #: 1.3.4 Pg. #: 1-8 Line #: paragraph 4 Code: C
Original Comment #:

Comment: If the LCS is primarily for OSDF use, wont this be a problem for the STP excavation area in the event of a storm? The potential for storm event water loads should be considered into the LCS for both OSDF and the STP.

10. Commenting Organization: OEPA Commentor: OFFO
Section #: 1.3.5 Pg. #: 1-8 Line #: paragraph 3 Code: C
Original Comment #:

Comment: What is PO-175? Please clarify.

11. Commenting Organization: OEPA Commentor: OFFO
Section #: 1.3.8 Pg. #: 1-9 Line #: paragraph 1 Code: C
Original Comment #:

Comment: The first section is somewhat unclear. Wouldn't it be best to go ahead with restorative grading, as much as possible in this area?

12. Commenting Organization: OEPA Commentor: OFFO
Section #: 1.3.12 Pg. #: 1-10 Line #: Code: E
Original Comment #:

Comment: Editorial comment: remove "on" in the first sentence.

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13. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.3.1 Pg. #: 2-10 Line #: Code: C
Original Comment #:
Comment: Excavated areas are to initially serve as sumps for stormwater control. Additional detail is required concerning this proposed practice.

Surface Water Management Plan

14. Commenting Organization: OEPA Commentor: DSW
Section #: Executive Summary Pg. #: ES-1 Line #: Code: C
Original Comment #:
Comment: This states that a minimum of 27 cubic yards of sediment storage area per acre of drainage is provided in sediment basin 1. Although correct for sediment storage, a minimum of 67 cubic yards of storage area in the basin is required per Rainwater and Land Development, this includes pool volume. The statement in the document can be misleading and should reference the total storage volume of the sediment basin. Smaller pool volumes will reduce detention time and the basin will not operate efficiently.

15. Commenting Organization: OEPA Commentor: DSW
Section #: 2.3.6 Pg. #: 2-4 Line #: Code: C
Original Comment #:
Comment: Please add that the elevation of the toe of the downstream check dam should be the same as the elevation of the top of the upstream check dam (so that the check dams create a series of pools).

16. Commenting Organization: OEPA Commentor: DSW
Section #: 4.2.1 Pg. #: 4-2 Line #: Code: C
Original Comment #:
Comment: Please add that the downgradient perimeter silt fence will be installed along the contour

17. Commenting Organization: OEPA Commentor: DSW
Section #: 5 Pg. #: 5-1 Line #: Code: C
Original Comment #:
Comment: What is the reason for installation of silt fence along drainage ditches?

18. Commenting Organization: OEPA Commentor: DSW
Section #: 5.2.3 Pg. #: 5-3 Line #: Code: C
Original Comment #:
Comment: There is a section of the trap range that appears to be a wetland area not yet delineated or added to the site wetland inventory. This area should be assessed prior to any

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disturbance of the trap range.

Technical Specifications

19. Commenting Organization: OEPA Commentor: OFFO
Section #: 02100 3.8B Pg. #: 5 Line #: Code: C
Original Comment #:
Comment: Ohio EPA was under the understanding that FDF would be responsible for maintaining the woodchip pile. Is the text proposing a change in roles or is this simply carry over language from a previous document?
20. Commenting Organization: OEPA Commentor: OFFO
Section #: 02100 3.8D Pg. #: 6 Line #: Code: C
Original Comment #:
Comment: The text should be revised to state that pipes greater than or equal to 12" must be split lengthwise.
21. Commenting Organization: OEPA Commentor: OFFO
Section #: 02206 Pg. #: Line #: Code: C
Original Comment #:
Comment: It is very difficult upon reviewing this specification to determine the requirements being placed on the liner material for the basin. The document should be revised to clarify total and lift thickness, compaction/moisture requirements, rock size and testing requirements for the liner of the basin.
22. Commenting Organization: OEPA Commentor: OFFO
Section #: 02270 2.1 Pg. #: 4 Line #: Code: C
Original Comment #:
Comment: Ohio EPA recommends use of biodegradable erosion blankets. Previous uses of UV stabilized netting at Fernald have had significant drawbacks including lifting by growing grass, entrapment of birds, and failure to decompose after long periods of time. Ohio EPA recommends use of a coconut mesh similar to that used on the recent Paddys Run stabilization effort.
23. Commenting Organization: OEPA Commentor: DSW
Section #: 02270 3.4 Pg. #: 6 and 7 Line #: Code: C
Original Comment #:
Comment: Stabilization of disturbed areas that are planned to be left idle for more than 45 days must be stabilized as soon as possible but no longer than 7 days after the last activity. Part A of this section reads as though the area must be stabilized within 7 days of deciding to suspend excavation (so that a contractor could claim to have decided he was not going to work an area

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weeks after performing their last activity there). Section B seems to indicate that an area can be left unstabilized for 45 days, whereas 7 days is the maximum that any area should be left unstabilized (unless it is being actively worked). Stabilization of disturbed areas that are planned to be left idle for more than 45 days must be stabilized as soon as possible but no longer than 7 days after the last activity

24. Commenting Organization: OEPA Commentor: DSW
Section #: 02270 3.7A Pg. #: 8 Line #: Code: C
Original Comment #:

Comment: Please add that the elevation of the toe of the downstream check dam should be the same as the elevation of the top of the upstream check dam (so that the check dams create a series of pools).

25. Commenting Organization: OEPA Commentor: OFFO
Section #: 02900 Pg. #: Line #: Code: C
Original Comment #:

Comment: This specification should be replaced with the June 10, 1998 version provided to Ohio EPA by facsimile.

Drawings

26. Commenting Organization: OEPA Commentor: DSW
Section #: Sheet G0006 Pg. #: Line #: Code: C
Original Comment #:

Comment: Bentonite Plug Detail. Detail on drawing does not match detail in 4/24/98 drawing rec'd from Tom Crawford (e.g. drawing shows 3.5' projection of plug whereas 4/24/98 drawing shows 4' minimum projection, 6" lifts with hand compaction to form surface contact with pipe not included). Detail referred to in specifications is hard to locate, recommend that appropriate detail be added to notes in the drawing.

27. Commenting Organization: OEPA Commentor: DSW
Section #: Sheet G0005 Pg. #: Line #: Code: C
Original Comment #:

Comment: Sediment Basin 1. In vicinity of installation of posts for construction fence to be used as baffle, liner must be deep enough to accomodate installation of posts (e.g. posts installed to 1'6", liner to be 6", then liner in vicinity of posts should be at least 2' to accomodate posts and maintain integrity of liner).

28. Commenting Organization: OEPA Commentor: DSW
Section #: G0006 Pg. #: Line #: Code: C
Original Comment #: